

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**FIRST SET OF INFORMATION REQUESTS OF NSTAR GAS COMPANY TO THE
DIVISION OF PIPELINE ENGINEERING AND SAFETY**

D.T.E. 05-36

November 16, 2005

Persons Responsible: Christopher Bourne

Information Request NSTAR 1-35

Please describe in detail the Division's process used to review and approve operation and maintenance manuals prepared by local gas distribution companies pursuant to 49 C.F.R. § 192.605. Please identify the frequency that a gas company's O&M manual is reviewed by the Division.

Response

The Division is not required to approve an operator's O&M manual. Applicable sections of a manual are reviewed in conjunction with field inspection(s). For example, an inspector would simultaneously review a company's corrosion control procedures, inspect actual corrosion control work in the field, and inspect corrosion control records at the company's office. An operator is required to review and update its O&M manual "at intervals not exceeding 15 months, but at least once each calendar year." 49 C.F.R. § 192.605. Each operator is reviewed for compliance with each applicable section of Part 192 at least once every three years as part of the Division's comprehensive inspection pursuant to the Division of Pipeline Engineering and Safety Inspection Procedures. Relevant section(s) of an operator's O&M manual would also be reviewed as part of an incident investigation.